



Department of Toxic Substances Control

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Edmund G. Brown Jr.
Governor

December 14, 2018

Mr. Derek Robinson
BRAC Environmental Coordinator
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San Diego CA 92147

SUBJECT: Department of Navy's Draft Final Parcel G Removal Site Evaluation Work Plan for Former Hunters Point Naval Shipyard, Dated November 2, 2018

Dear Mr. Robinson:

The Department of Toxic Substances Control (DTSC) has reviewed the revised draft final Parcel G Removal Site Evaluation Work Plan (Work Plan) for the former Hunters Point Naval Shipyard site dated November 2, 2018 and received on November 9, 2018. The revised Work Plan includes the revised Sampling and Analyses Plan (SAP) as Appendix A.

DTSC provided general comments on the draft Work Plan and revised draft final in letters to the Navy dated March 26, 2018 and August 14, 2018, respectively. Additionally, follow-up comments were provided by email on October 19, 2018. Our comments have been addressed except for comment number eight of the August 14, 2018 letter. This comment has been partially addressed. The Work Plan indicates that Phase 2 of the fieldwork includes radiological surface scans. However, the language is not clear that the durable cover will be removed as was previously discussed with the Navy. Please clarify this in the Work Plan.

We are providing one additional comment. The revised Work Plan Section 8.5 discusses air monitoring to be conducted at Parcel G. We understand that a site-specific air monitoring plan and associated Standard Operating Procedures (SOPs) are being prepared and will be submitted to the regulatory agencies for review.

The air monitoring plan should adhere to the 2010 Basewide Dust Control Plan, which includes monitoring of COCs (total suspended particulates [TSP], arsenic, manganese, lead, particulate matter smaller than 10 microns in diameter [PM10], and asbestos) and radionuclides of concern (ROCs) to ensure worker and community safety.

Due to the proximity of the new Parcel A residential units, we request the development of dust action levels based on a residential exposure scenario. The DTSC Human Health Risk Office (HERO) has previously prepared dust action levels for various cleanup sites. Upon request, we can provide you with a recent HERO dust action level memorandum. Please refer to DTSC Human Health Risk Office (HERO) Note 3 when developing COC dust action levels (<https://dtsc.ca.gov/AssessingRisk/upload/HHRA-Note-3-June-2018.pdf>).

Additionally, the primary objectives of air monitoring and sampling must be as follows:

- Continual air monitoring during work activities to determine if airborne concentrations of particulate matter and COCs are more than action levels or regulatory limits established for the Site;
- Develop a relationship between fugitive dust levels and concentrations of COCs, so that direct-reading particulate measurements can be used as a surrogate for COC concentrations in dust and, appropriate actions can be taken to reduce exceedances if necessary;
- Develop a relationship between total Volatile Organic Compounds (VOCs) levels and concentrations of COCs, so that direct-reading total VOC measurements can be used as a surrogate for site VOC concentrations (if necessary); and
- Ensure that engineering controls and work practices are effective to minimize potential off-site impacts.

The air monitoring plan must be approved by the regulatory agencies prior to the start of the re-evaluation of the soil survey units' fieldwork at Parcel G.


DTSC provided comments by email on the draft SAP on July 31, 2017 and September 29, 2017, and in a letter dated September 24, 2018. Our comments have been adequately addressed.

As indicated in our August 14, 2018 letter, DTSC defers to the California Department of Public Health (CDPH) and the United States Environmental Protection Agency (USEPA) on the technical radiological aspects of the Work Plan, as well as the SAP. CDPH has provided their comments in the enclosed memorandum.

Mr. Derek J. Robinson
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If you have any questions, please feel free to contact me at Juanita.Bacey@dtsc.ca.gov or (510) 540-2480.

Sincerely,



Nina Bacey, Project Manager
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California Department of Toxic Substances Control

Enclosure

cc: via email

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(continued)

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DATE: December 13, 2018

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FROM: Sheetal Singh
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SUB: CDPH-EMB review of the **Draft FINAL Parcel G Removal Site Evaluation Work Plan, Hunters Point Naval Shipyard San Francisco, California.**
Issued November 2, 2018

As submitted by the California Department of Toxic Substances Control (DTSC), Environmental Management Branch (EMB) of the California Department of Public Health (CDPH) reviewed the **Draft FINAL Parcel G Removal Site Evaluation Work Plan, Hunters Point Naval Shipyard San Francisco, California,** for radiological issues. EMB concurrently addressed Sampling and Analysis comments that were not adequately addressed in this document. This review was performed in support of the Interagency Agreement between DTSC and CDPH.

If you need further assistance please contact Matthew Wright of my staff at (916) 210-8550 or via email at Matthew.Wright@cdph.ca.gov.



Activity: Review Comments for **Draft Final Work Plan, Parcel G Removal Site Evaluation Sampling and Analysis Plan**, Former Hunters Point Naval Shipyard, San Francisco, California. Issued November 02, 2018.

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The Environmental Management Branch (EMB) of the California Department of Public Health (CDPH) appreciates the opportunity to review *Draft Final Work Plan, Parcel G Removal Site Evaluation Sampling and Analysis Plan (SAP)*, Former Hunters Point Naval Shipyard, San Francisco, California, issued November 02, 2018. A few comments that were not adequately addressed in the Draft Final SAP are listed below. There are also **3 new comments** that need to be addressed. The EMB cannot concur with the *Draft Final Work Plan, Parcel G Removal Site Evaluation Sampling and Analysis Plan* until all the comments are addressed.

Previous SAP Specific Comments:

1. EMB's original **Specific Comment #11** was not adequately addressed. This comment is one of a series of comments where EMB requested the removal of the word "allegation(s)" from any reference of Tetra-Tech E.C (TtEC) data manipulation due to the two guilty pleas and admission of falsified data. Sampling and Analysis (SAP) Worksheet #10 ("Conceptual Site Model"), Page 39, Paragraph two, Sentence one, still contains the word "allegation."
2. EMB's **Specific Comments #25, #26, and #27**. All of these comments question minimal detectable concentration (MDC) discrepancies between off-site laboratory SOPs and stated project MDCs. Most notably, the comments stated project MDCs are well below laboratory SOP "typically" observed MDC values. SAP Worksheets #15 "A", "B", and "C" still list the project MDCs which are below the laboratory observed MDC values. Please explain.
3. EMB's **Specific Comment #39** addressed survey units (SUs) identified in previous final status surveys (2009 and 2010) that appear to be missing from the current work plan. The following SUs are still not addressed in the current document:

Building ID:	Unaddressed SU(s):
351A	Crawlspace "S", "R", and "U"
366	69 and 70
411	1

4. EMB **Specific Comment #40** recognized that all of the listed utilities clearance subcontractors were located in the Virginia, Maryland, and New Jersey areas and

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requested possible local (California) subcontractors. No changes appear to have been made in the DRAFT FINAL to address this.

New Specific Comments:

5. Section 3, Table 3.2, "Phase 2 Soil Trench Units":

This Table does not include a sum for column 4, "Number of Samples in Original Trench Material". The sum for column 4 is 648 soil samples. Please correct.

6. Section 3.54.6, Former Building Site and Crawl Space Unit Design, page 3-10, paragraph four, sentence one:

*At the former Building Sites: SU 27 (peanut spill) and SU 28 ((LWTS) will be excavated to 2 and 10 feet bgs, respectively (Figure 3-1)." Please make clear in the text that these excavations will also receive MARSSIM based soil sampling/surveys. Additionally please clarify if the crawl space below the building 351A will be excavated prior to MARSSIM based soil sampling/surveys.

7. Section 4.4.1.2, Static Measurements, page 4-4, paragraph three, sentence one:

"The number of systematic measurements performed will be based on the guidance described in MARSSIM Sections 5.5.2.2 and 5.2.2.5 (USEPA et al., 2000) using the unity rule as the example basis for calculating the minimum static measurement frequency." It is noted that the unity rule is discussed in MARSSIM Section 4.3.3, "Use of DCGLs for Sites with Multiple Radionuclides". MARSSIM Section 5.2.2.5 is titled, "Determining Survey Location", and does not address the use of the unity rule in determining number of static sample locations. Please provide citation(s) for use of the unity rule in determining number of static sample locations. Please provide example equation for the use of the unity rule in determining number of static sample locations.